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**Sent:** Wednesday, March 30, 2005 4:09 PM  
**To:** mlpacommments@resources.ca.gov  
**Subject:** MLPAComments: Late Master Plan Comments

Thank you for the opportunity to review the revised master plan. Due to the short turn around time, the following comments are my personal comments only.

Please use only one measurement for distance, either kilometers or nautical miles, not both. Also what is the length of the California Coast? The plan references Department of Fish and Game patrols over 1,100 miles of coastline.

Where are, and what are the dimensions of, the five upwelling centers of the California Coast? And, how will the work of the Long Term Ecological Research program be incorporated into the MLPA? If the areas around upwelling centers are included within MPAs, should these be seasonal as the upwelling occurs during a specified time frame?

Reading the document was difficult due to having to refer to the Act as not always was the Act articulated accurately, such as on page 32, "the MLPA states that MPAs may aim to achieve either or both of the following" versus "The preferred alternative may include MPAs that will achieve either or both of the following objectives."

A reference is made to a National Report of the National Marine Sanctuary Program's Advisory Councils. Is this the July 2000 report located at [http://www.sanctuaries.nos.noaa.gov/special/SAC\\_workshop\\_reportfinal.pdf](http://www.sanctuaries.nos.noaa.gov/special/SAC_workshop_reportfinal.pdf) Also, how does this report compare and contrast to the National Academy of Public Administration report that states the Sanctuary program must reverse "an unnecessary and unproductive posture of fearing a strong sanctuary advisory council."

How does the monitoring program and its timeline relate to the Fish and Game Commission's triennial review process?

I suggest the BRTF MPA Design Process have a first step to outline what meets the Act's criteria of "best readily available scientific information." This will allow the public to understand what science is available. The report indicates that there have been decades of experience and study with regards to MPAs. What reports and literature are available that meets the Act's requirements so that all can be involved in the decision making process? Where the copyright laws allow, these documents should be placed on the MLPA web site.

There appears to be a bias in the draft master plan, as an example on page 10 is a statement "One important between these closures and MPAs is that the former, while potentially of long-term duration, are not intended as permanent closures." The Act does not state that MPAs are to be permanent, in fact the Act provides for the establishment, modification, or abolishment of existing MPAs or new MPAs established under the Act.

There appears to be an over emphasis on "networks" and fisheries. The sixth and final goal of the MLPP is to ensure that the state's MPAs are designed and managed, to the extent possible, as a network. Yet, this framework makes this the first goal and provides a first opener of "biological interactions." Some of the suggested "network" guidelines include items for the protection of adult (fish) populations and to facilitate dispersal among MPAs for important fish and invertebrate groups. Which leads one to belief the MLPA process is turning away from the broad direction of the California Legislature to

something much more specific regarding the regulation of fishing? To quote from the plan “1) the goals of the MLPA do not relate primarily to fishery management.”

Again, thank you for the opportunity to review and comment on the revised Master Plan.

Sincerely,

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